



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS,
TRIBAL AND PUBLIC
AFFAIRS

August 7, 2014

Will Runnoe
Bureau of Land Management
Cottonwood Field Office
Attention: Sheep SEIS
1 Butte Drive
Cottonwood, ID 83522

Re: EPA Region 10 comments on the Cottonwood Resource Management Plan Amendment
(EPA Project number 04-048-AFS).

Dear Mr. Runnoe:

The U.S. Environmental Protection Agency has reviewed the Draft Supplemental Environmental Impact Statement for the proposed amendment to the Cottonwood Resource Management Plan. Our review was conducted in accordance with the EPA responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

The DSEIS analyzes the proposal to provide new direction for the management and allocation of domestic sheep grazing on 19,405 acres of BLM land. The purpose of the analysis is to avoid or mitigate potential disease transmission from domestic sheep and goats to bighorn sheep within the Hells Canyon and Salmon River bighorn sheep metapopulations. The four allotments under consideration include the Marshall Mountain, Partridge Creek, Hard Creek, and Big Creek allotments.

The DEIS analyzes a no action alternative and five action alternatives regarding allowing or prohibiting grazing on the allotments. Prohibitions on grazing are based on proximity to core herd home ranges and risk of contact between domestic sheep and goats and bighorn sheep. Alternative B is identified as the preferred alternative and emphasizes reducing potential disease to bighorn sheep while providing some opportunity for grazing domestic sheep. To accomplish this, Alternative B prohibits domestic sheep and goat grazing on all of the allotments except Big Creek, where it is predicted that there will be very low interspecies contact. Additionally, terms and conditions would be added to the grazing lease to reduce the potential for contact between domestic sheep and bighorn sheep on Big Creek Allotment.

Disease transmission (namely bacterial pneumonia) from domestic sheep to bighorn sheep has been reported as the number one cause for bighorn sheep population declines throughout North America¹. We acknowledge the agency's need to accommodate multiple use activities while promoting wildlife populations. With this in mind, we support prohibiting grazing on allotments that overlap or are in close proximity to bighorn sheep range. We support the BLM's proposal and believe that the terms and

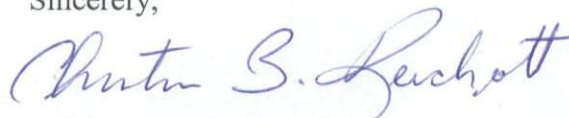
¹ USFS. Southwest Idaho Ecogroup Land and Resource Management Plans. 2010. Management Recommendations states that, "separation, either spatially, temporally, or both of bighorn sheep from domestic sheep has been recommended by leading bighorn sheep disease experts."

conditions coupled with ongoing monitoring/adaptive management should provide a protective management strategy. Based on our review, we are rating the DEIS as LO (Lack of Objections). A copy of EPA's rating system is enclosed for your reference, or you may go to this link: <http://www.epa.gov/compliance/nepa/comments/ratings.html>

We also commend the BLM for coordinating with the Payette National Forest, who worked with population and disease experts to develop methods and models based on telemetry data related to the viability of bighorn sheep populations. We believe the BLM's initiation of the cooperative agreement with the Forest Service and Nez Perce Tribe will provide a forum to share information between agencies that can inform adaptive management and support resilient wildlife habitat.

We appreciate the opportunity to review and comment on the DSEIS. If you have any questions about our review, please contact me at 206-553-1601, or by electronic mail at reichgott.christine@epa.gov. Or you may contact Lynne McWhorter of my staff at 208-378-5757 or by electronic mail at mcwhorter.lynne@epa.gov

Sincerely,

A handwritten signature in blue ink, reading "Christine B. Reichgott".

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

Enclosure

1. EPA Rating System

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.